

April 22, 2014

RECEIVED
FEDERAL ELECTION
COMMISSION

2014 APR 23 PM 12: 53

OFFICE OF GENERAL
COUNSEL

MUR #

680

Office of General Counsel
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

RE: **COMPLAINT OF VIOLATION OF FEDERAL ELECTION CAMPAIGN LAWS AND/OR COMMISSION REGULATIONS**

Complainant:

Mr. Chad Lee Choat
Claremore, OK 74017

Respondents:

1. Michael Jeffrey Turner, Republican Candidate for Congress in the 5th District of Oklahoma
2. Mike Turner for Congress, Principal Campaign Committee
3. Kyle Walton Denham, Treasurer, Mike Turner for Congress
615 N Hudson, Suite 320
Oklahoma City, OK 73102

Description of Violation(s)

On March 6, 2014 Mr. Michael Jeffrey Turner officially announced his candidacy for the 5th congressional district of Oklahoma. His press release was carried by multiple media outlets and his own website <http://theokieblaze.com/stories/2014/03/08/oklahoma-state-rep-mike-turner-announces-run-for-u-s-congress/>, <http://mikeforthehouse.com/media/>).

Mr. Turner prepared his FEC Form 2 (Statement of Candidacy), designating Mike Turner for Congress as the Principal Campaign Committee, on March 6, 2014 and it was received by the FEC on March 13.

FEC rules provide that within 10 days of filing the FEC Form 2, a candidate must file FEC Form 1 (Statement of Organization).

This rule was not complied with, and as a result for more than 1 ½ months there was no public disclosure of the officers responsible for compliance with federal campaign law nor even at what institution campaign funds were held. When the Form 1 was finally hand-delivered to the FEC on April 15, 2014, it appeared to be backdated to March 7, 2014 by Mr. Turner or Mr. Denham.

FEC rules provide that quarterly statements (FEC Forms 3) are required to disclose to the public how much and from whom campaign funds were raised, and to whom and for what purpose campaign funds were disbursed. The initial quarterly report was due on April 15, 2014, which according to news accounts should have shown that Mr. Turner raised a minimum of \$500,000 and spent about \$170,000, far and away the most of any candidate for this office. (<http://newsok.com/self-funded-oklahoma-legislator-has-most-money/article/3986512>).

This rule was not complied with, and the result is that apparently massive amounts of cash has been raised, and equally massive amounts have been disbursed, without any accountability to the public by what has become an illegally operated campaign organization.

As of April 22, 2014, a search of the fec.gov public disclosure website showed no FEC Form 3 for the campaign.

As noted above, Mr. Turner has given interviews stating that as of March 31st his campaign had spent \$170,000 on services ranging from polling with Wilson, Perkins, Allen Opinion Research, to TV advertisements and multiple mailers (see attachments).

Since that time, my understanding is that there has been additional advertising, and even more mailers, with estimates placing the total spent at more than \$225,000. Mailers and advertising all appear to include the words "Paid for by Turner for Congress".

Thank you for your attention to this matter.

Chad Choat

Chad Choat

Claremore, OK 74017

SUBSCRIBED AND SWORN BEFORE ME IN THE COUNTY OF Rogers, STATE OF OKLAHOMA, ON THIS 22nd DAY OF APRIL, 2014.

Lyndsey Martin
(Notary's official signature)

10-05-2017
(Commission Expiration)



[illegible]

Data Catalog

☒ DOUGLAS, PATRICK

☒ JOLLY, JOSEPH CLARK

☒ RUSSELL, STEVEN DANE

TURNER, MICHAEL JEFFREY

Cash on Hand

\$168,622

\$22,011

\$0

Receipts

\$177,905

\$106,953

\$0

Ind: 10/20/2008

\$168,622

\$106,953

\$0

ZAC

☐ \$10,000

☒ \$10,000

\$0

Review & Update Committee Detail

Committee Name: House Committee on Education and the Labor Force

FEDERAL ELECTION COMMISSION

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2014-2015 ELECTION DISCLOSURE PORTAL / CANDIDATE AND COMMITTEE VENER / COMMITTEE DETAILS

Site for Committee ID: C000561783

Two Year Summary

2014-2015 Summary

Two Year Period

Committee Name


House Committee on Education and the Labor Force

Committee Details



**AND... AND... AND...
Heavenly creatures are
singing and dancing!**

MIKE TURNER
.....



MIKE TURNER
U.S. HOUSE OF REPRESENTATIVES

Against the
CONSERVATIVE

☒ Balance the budget
☒ Repeal ObamaCare
☒ Uphold the Constitution
☒ Defend the

